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95 RF 03250

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EG&G ROCKY FLATS, INC.

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April 7, 1995

95-RF-03250

Jessie M Roberson
Assistant Manager for
Environmental Restoration
DOE/RFFO

ACCELERATED ACTION FOR CLOSURE OF OPERABLE UNIT 3 - SGS-124-95

Action None required

In response to the recent budget reduction for Operable Unit 3, the following strategy is being implemented to maintain Interagency Agreement (IAG) commitments and facilitate the early closeout for this operable unit

The Remedial Investigation schedule will be accelerated to deliver the Draft RCRA [Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation (RFI/RI) report to the regulatory agencies in fiscal year 1995. This acceleration will ensure that available funding for this project is used most effectively. This strategy assumes that no additional contaminants of concern or areas of concern will be required by the agencies. Additionally, it is assumed that the Draft RFI/RI report will proceed without receiving agency approval on the Colorado Department of Public Health and Environment (CDPHE) Conservative Screen Letter Report, Ecological Evaluation, Exposure Scenario Technical Memorandum, and the Model Selection Technical Memorandum.

While we fully expect to seek agency approval of these documents and will incorporate comments on these documents into the Draft RFI/RI report, the project will no longer tie progress to agency review and approval. As you know, this process is the most difficult aspect of the project to control and as a result places a tremendous uncertainty on the cost and schedule of the project. It is expected that approval of the above documents will be included in the approval of the RFI/RI report.

By accelerating the Draft RFI/RI schedule to achieve submittal in fiscal year 1995, we will beat the current IAG milestone of October 30, 1995 by approximately one month. This will allow more time to resolve any remaining issues. Upon submittal, we will aggressively seek agency comments and pursue resolution to facilitate approval of the final document. By submitting the document early and aggressively pursuing agency comments we may be able to realize additional schedule economies in developing the final document.

We are expecting to deliver a technically sound and defensible document. It is anticipated that agency comments will be more political than technical in nature and that resolution will not require significant reworking of the document.

Coincident with the submittal of the Draft RFI/RI report will be the submittal of the Draft Proposed Remedial Action Plan. This plan will include an Applicable or Relevant and Appropriate Requirements analysis. Informal discussions with the agencies indicate that a

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CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO

ACTION ITEM STATUS

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jm


ADMIN RECORD

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Feasibility Study is not warranted and that this approach may be acceptable in achieving a No Action Record of Decision. Therefore, the Feasibility Study has been eliminated from the schedule. Upon completion of the Responsiveness Summary for the Proposed Remedial Action Plan, the Record of Decision will be developed. This is expected to be completed in early fiscal year 1997 and will close out OU 3.

This aggressive approach to OU 3 is consistent with the objectives of the site and we look forward to your support in helping to achieve these objectives. If you have any questions, please contact Mark Buddy at extension 8519 or Tracey Spence at extension 8551.



S. G. Stiger, Director
Environmental Restoration Program Division
EG&G Rocky Flats, Inc

MSB jlm

Orig. and 1 cc - J M Roberson

cc:
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